

**\*\*FILED\*\***

**12:32 pm, Jul 12, 2022**

**U.S. DISTRICT COURT**

**EASTERN DISTRICT OF NEW YORK**

RCH:OO  
F. #2022R00544

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
----- X

UNITED STATES OF AMERICA

- against -

CHRISTOPHER GUNN,  
also known as "Deboski Gunn"  
and "Deboski,"

Defendant.

----- X

THE GRAND JURY CHARGES:

TRANSMISSION OF THREATS TO INJURE

1. On or about October 4, 2021, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER GUNN did knowingly and intentionally transmit in interstate commerce one or more communications containing one or more threats to injure the person of another, to wit: communications threatening the lives of, and threatening bodily injury to Jane Doe-1, Jane Doe-2 and Jane Doe-3, individuals whose identities are known to the Grand Jury.

(Title 18, United States Code, Sections 875(c) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), which require any person convicted of such offense to forfeit any property,

I N D I C T M E N T

Cr. No. **1:22-cr-00314(HG)(VMS)**  
(T. 18, U.S.C., §§ 875(c), 981(a)(1)(C)  
and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be

divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 981(a)(1)(C); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
FOREPERSON

  
BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

CHRISTOPHER GUNN,


Defendant.

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**INDICTMENT**

(T. 18, U.S.C. §§ 875(c), 981(a)(1)(C), and 3551 et seq.; T. 21, U.S.C.,  
§ 853(p); T. 28, U.S.C., § 2461(c))

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*A true bill.*  
 Foreperson

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

\_\_\_\_\_  
Clerk

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Bail, \$ \_\_\_\_\_

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*Olatokunbo Olaniyan, Assistant U.S. Attorney*  
(718) 254-6317